

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
DANIEL V. RHONE and :
TRACEY L. RHONE, :
Debtors :
 :
CHARLES J. DEHART, III :
STANDING CHAPTER 13 TRUSTEE :
Movant :
 :
vs. :
DANIEL V. RHONE and :
TRACEY L. RHONE, :
Respondents : CASE NO. 1:18-bk-01945-RNO

TRUSTEE'S OBJECTION TO AMENDED CHAPTER 13 PLAN

AND NOW, this 5th day of November, 2018, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtors' plan for the following reason(s):

- a. The plan is underfunded relative to claims to be paid – 100% plan.
(unsecured portion of cramdowns)

WHEREFORE, Trustee alleges and avers that debtor(s) plan is not confirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Charles J. DeHart III

/s/James K. Jones
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 5th day of November, 2018, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

John M. Hyams, Esq.
2023 N. 2nd St, Ste 203
Harrisburg, PA 17102

/s/Cecilia Martin
Office of Charles J. DeHart, III
Standing Chapter 13 Trustee